

RANDALL S. LUSKEY (SBN: 240915)  
rluskey@paulweiss.com  
**PAUL, WEISS, RIFKIND, WHARTON  
& GARRISON LLP**  
535 Mission Street, 24th Floor  
San Francisco, CA 94105  
Telephone: (628) 432-5100  
Facsimile: (628) 232-3101

ROBERT ATKINS (*Pro Hac Vice*)  
ratkins@paulweiss.com  
**PAUL, WEISS, RIFKIND, WHARTON  
& GARRISON LLP**  
1285 Avenue of the Americas  
New York, NY 10019  
Telephone: (212) 373-3000  
Facsimile: (212) 757-3990

*Attorneys for Defendants*  
UBER TECHNOLOGIES, INC., RASIER, LLC,  
and RASIER-CA, LLC

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

This Document Relates To:  
  
ALL ACTIONS

Case No. 3:23-md-03084-CRB

**DEFENDANTS UBER TECHNOLOGIES,  
INC., RASIER, LLC, AND RASIER-CA,  
LLC'S SUBMISSION CONCERNING  
APPOINTMENT OF A SPECIAL  
SETTLEMENT MASTER**

Judge: Hon. Charles R. Breyer  
Courtroom: 6 – 17th Floor

Date: November 3, 2023  
Time: 11:00 a.m.

**DEFENDANTS' SUBMISSION CONCERNING  
APPOINTMENT OF A SPECIAL SETTLEMENT MASTER**

In accordance with the Court's Pretrial Order No. 1, dated October 6, 2023, defendants Uber Technologies, Inc., Rasier, LLC, Rasier-CA, LLC (collectively "Uber"), hereby make this submission concerning the appointment of a Special Settlement Master. Defendants respectfully suggest the following mediators as candidates to serve as Special Settlement Master, either individually or in a joint capacity:

**1. Hon. Shelley C. Chapman (Ret.)**

Judge Chapman is Senior Counsel in the Business Reorganization & Restructuring Department and Chair of the Alternative Dispute Resolution Practice Group at Willkie Farr & Gallagher LLP. Prior to joining Willkie, Judge Chapman served as a U.S. Bankruptcy Judge for the Southern District of New York for 12 years. During that time, Judge Chapman oversaw the Lehman Brothers Holdings bankruptcy case—the largest bankruptcy case in history—and many other complex chapter 11 cases. During her time on the bench, Judge Chapman presided over the chapter 11 case of the Roman Catholic Diocese of Rockville Centre, New York, which faced Child Victims Act-related liabilities.

Judge Chapman has also served as a court-appointed mediator in several complex chapter 11 cases involving alleged sexual misconduct and/or complex litigations of a sensitive nature. For instance, the court in *In re Madison Square Boys & Girls Club, Inc.*, No. 1:22-bk-10910-SHL (Bankr. S.D.N.Y.), appointed Judge Chapman to mediate roughly 150 child sex abuse claims. The court in *In re Purdue Pharma L.P.*, No. 7:19-bk-23649-SHL (Bankr. S.D.N.Y.), appointed Judge Chapman to mediate talks between the Attorneys General of nine different jurisdictions and the Sackler family regarding the Sackler family's alleged involvement in the opioid crisis. Thus, Judge Chapman has experience presiding over and mediating high-profile and complex litigations—including those involving allegations of sexual harassment and sexual assault.

**2. Hon. Daniel Weinstein (Ret.)**

Judge Weinstein is a JAMS mediator based in San Francisco, California. He is recognized as one of the nation's preeminent mediators of complex civil disputes, a pioneer in the development

of mediation, and a founder of JAMS. Since 1997, Judge Weinstein has mediated cases with aggregate values in the billions of dollars annually. Judge Weinstein also previously served on the Superior Court of San Francisco from 1982 to 1988.

Judge Weinstein has served as a mediator in several complex and diverse litigations. Among many other court appointments, Judge Weinstein served as special settlement master in *Air Crash Off Point v. Alaska Airlines, Inc.*, No. 3:00-md-01343-CRB (N.D. Cal.), wherein this Court appointed Judge Weinstein as the mediator for a settlement of 80 death cases arising out of the Alaska Airlines Flight 251 crash. Other notable cases include:

- *Doe v. Unocal Corp*, several federal and state actions alleging human rights violations in connection with a gas pipeline project in Myanmar;
- *In re TFT-LCD (Flat Panel) Antitrust Litigation*, No. 3:07-md-01827-SI (N.D. Cal.), concerning an alleged price-fixing conspiracy among computer, television, and cellphone manufacturers;
- *In re Credit Default Swaps Antitrust Litigation*, No. 1:13-md-02476-DLC (S.D.N.Y.), concerning an alleged conspiracy to prevent new participants from entering the credit default swap market;
- *Lehman v. Transbay Joint Powers Authority*, No. CGC-16-553758 (Super. Ct. San Francisco Cty., Cal.), regarding the sinking Millennium Tower in San Francisco; and
- *Andrews v. Plains All American Pipeline, LP*, No. 2:15-cv-04113-PSG-JEM (C.D. Cal.), regarding a 2015 Santa Barbara oil spill.

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Uber is prepared to provide the Court additional information on its proposed candidates if helpful. Uber also is reviewing the submission by certain plaintiffs (Dkt. No. 56) regarding potential candidates for a Special Settlement Master, and will be prepared to respond on or before November 15, 2023, in accordance with Pretrial Order No. 1.

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1 Dated: November 2, 2023

**PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP**

3 By: /s/ Randall S. Luskey

4 Randall S. Luskey (SBN: 240915)  
5 535 Mission Street, 24th Floor  
6 San Francisco, CA 94105  
7 Telephone: (628) 432-5100

8 Robert Atkins (*pro hac vice*)  
9 1285 Avenue of the Americas  
10 New York, NY 10019  
11 Telephone: (202) 373-3000

12 *Attorneys for Defendants*  
13 UBER TECHNOLOGIES, INC.,  
14 RASIER, LLC, and RASIER-CA, LLC  
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